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04/07/2006 12:19 PM

To Margaret Alkon/R9/USEPA/US@EPA  
cc "Rick Abel (E-mail)" <Rick.Abel@bhpbilliton.com>, "Renee Klimczak (E-mail)" <Renee.Klimczak@bhpbilliton.com>, "Kevin Wright (E-mail)" <kwright@entrix.com>, "Kathi Hann  
bcc

Subject Response to Information Requests

History:  This message has been replied to and forwarded.

Margaret: Attached please find a letter responding to your information requests. Included with the letter is the requested Errata sheet and also replacement copies of Appendix A and Appendix C. These replacements reflect some updated information as well as edits suggested by the questions. One of the updates is that BHP received a new specification for the Wartsila engines being used for FSRU power generation. A copy of that specification is also included for your records.

My understanding is that with this letter BHP will have responded to all of air related questions that have been posed to the company by EPA. Please let me know if you believe that this is not the case.

Thanks.

Tom

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4-6-06 Ltr to Alkon.pdf Attachment 1.pdf Attachment 2.pdf Attachment 3.pdf W' 50 DF emission.pdf



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April 7, 2006

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**VIA EMAIL & U.S. MAIL**

Ms. Margaret Alkon  
ORC-2  
United States Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: BHP Billiton LNG International Inc.; Cabrillo Port  
Response to Information Requests**

Dear Margaret:

By emails dated March 14, 2006, March 29, 2006 and March 30, 2006 you requested responses to questions raised by the BHP Billiton LNG International ("BHP") preconstruction air permit application. This letter is intended to answer each of the questions you raised in those emails.

EPA March 14, 2006; Question 1: *Page 2-10 says that diesel will be used to operate a crane onboard the FSRU. However, page 3-4 says that the cranes used for material handling will be electric. Please clarify what types of cranes will be used.*

As noted, the application inadvertently states at page 2-10 that the on-board cranes will be diesel fired. This was an error. The description on page 3-4 accurately states that the on-board material handling crane will be electric. This point is corrected via the attached errata sheet.

EPA March 14, 2006; Question 2: *Is the sulfur content in the diesel burned in the Wartsila 9L50DF engines 1 ppm by weight or by volume?*

References to "ppm" in relation to the fuel sulfur content in the gas should be stated as "ppmv." References to "ppm" in relation to the fuel sulfur content in the diesel should be stated as "ppmw." This point is corrected in the revised emissions inventory spreadsheets included with this letter. Please note that the sulfur content in the diesel is neither 1 ppm by weight nor by volume; the sulfur content in the gas is 1 ppmv and the sulfur content in the diesel is 15 ppmw.



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EPA March 14, 2006; Question 3: *The application says that diesel will be used in monthly tests of the power generator and firewater pumps to ensure their continued operability. Since the Wartsila backup generator will potentially have limited use on diesel during emergencies, will monthly testing on diesel also be necessary for this engine?*

The emergency power generator and firewater pump engines are exercised periodically in order to ensure that they are in operating condition in the event of an emergency. As noted, they operate on diesel and will be exercised using diesel fuel. In contrast, the Wartsila 9L50DF generator engines are intended to operate on gas at all times (with 0.6% diesel pilot fuel (heat input basis)). However, as the application identifies at page 3-2 the Wartsila generator engines have dual fuel capacity and so could burn exclusively diesel in the event that the gas supply was interrupted. Backup operations using exclusively diesel are limited to the equivalent of one Wartsila engine operating 100 hours per year; this equates to a total of 48,417 gallons of diesel fired in the Wartsila generator engines for backup operations. Each of the four Wartsila generator engines could be periodically tested on diesel. However, there is no regular exercise routine planned for them at this time as there is for the emergency generator and firewater pumps. To the extent that the Wartsila generator engines are periodically tested on diesel, the fuel usage will be maintained at less than 48,417 gallons per year.

EPA March 14, 2006; Question 4: *Page 4-11 demonstrates compliance with the 300 ppmv and 10 ppmv limits at the point of discharge but the demonstration is not so clear for the sea level concentrations at the property line. Did BHP model to show that these concentrations would not be exceeded? Also, contrary to what is indicated in the Cabrillo Port air permit application, the rule does not have separate requirements for point sources and area sources; the requirements of Rule 54(B) apply to all sources.*

No modeling is necessary to demonstrate compliance with these limits. The Project is not anticipated to emit H<sub>2</sub>S and so there is no concern that concentrations would exceed 10 ppmv at the edge of the exclusion zone, which is the equivalent to the property line for this source. Nor is SO<sub>2</sub> a concern. The emission spreadsheets document the maximum SO<sub>2</sub> emission rates for all of the equipment. The SO<sub>2</sub> concentration from the SCVs at the discharge point is 0.1 ppmv; the SO<sub>2</sub> concentration from the Wartsila engines at the emission point is 0.034 ppmv on gas and 0.29 ppmv on diesel. The firewater pump, emergency generator and lifeboat engine, all fired on diesel, emit in the aggregate less than 1 ppmv SO<sub>2</sub>. With eight SCVs and four Wartsila engines, the maximum SO<sub>2</sub> emissions, even if every unit was simultaneously operating, would be only approximately 3 ppmv SO<sub>2</sub> at the point of discharge. There is no concern that the Project would exceed 300 ppmv at the edge of the exclusion zone, 500 meters away. Therefore, no modeling



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was performed. We acknowledge that the rule does not distinguish between point and area sources.

EPA March 14, 2006; Question 5: *Table FSRU 4 indicates that the exhaust temperature for the main generators will be 800 degrees F. What is the minimum temperature at which the SCR catalyst becomes effective?*

The typical minimum temperature at which an SCR catalyst is effective is 650°F. Although the exact catalysts have not yet been identified, BHP anticipates that this will be the low end temperature. However that cannot be stated with certainty until the catalyst manufacturer and type are identified. BHP anticipates that the generator engines will reach minimum temperature on their exhaust gas in less than an hour.

EPA March 14, 2006; Question 6: *The g/hW-hr emission rates in Table FSRU 11: Firewater Pumps Emission Summary are the same for the firewater pumps and emergency engine (see next page) except for SO<sub>2</sub>. Is one of these a typo?*

There is no typo in the emissions estimates. The particular make and model of the firewater pumps and emergency generator engine have not yet been specified. Therefore, it is necessary that BHP make conservative estimates of the emission factors. As the engines will all be subject to the EPA Tier 2 emission standards in 40 CFR § 89.112, BHP conservatively used those maximum allowable emission rates as the emission factors. As the Tier 2 standards are the same for both the firewater pump and emergency generator engines, the NO<sub>x</sub>, VOC (NMHC), CO and PM emission factors are all identical as between the two types of engines. However, because there is no Tier 2 standard for SO<sub>2</sub>, the SO<sub>2</sub> emissions factors were derived based on the engine efficiency and the maximum allowable sulfur content of the fuel. The greater the engine efficiency, the lower the SO<sub>2</sub> emissions as follows:

Engine Type	Efficiency	SO <sub>2</sub> Emissions (g/bhp-hr)
Firewater Pump	35 %	0.005
Emergency Generator	40 %	0.004
Freefall Lifeboat	30 %	0.006

The engine efficiency is currently listed as a parameter on each spreadsheet.

As a result, the emission factors for the firewater pump engines and the emergency generator engines are the same for all regulated pollutants other than SO<sub>2</sub>.



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EPA March 14, 2006; Question 7: *In the Table entitled Operating Emissions Summary it appears as though one of the Wartsila engines will specifically be designated as the backup. Please confirm that this means the following: 1) for normal operations, the three main generators will always be used when they are capable of operating and the backup generator will only be used when one of the three main generators goes down for maintenance.; 2) although all of the Wartsila engines are dual fueled, the backup engine will be the only one that actually fires on diesel during emergency situations (limited to 100 hours per year).*

There is no specific Wartsila engine that is designated the back-up unit. All four have dual fuel firing capability. The operation of the units will be circulated as needed to allow periodic servicing of each engine. If the gas supply were interrupted the operators would make a decision at the time as to which engine would be operated on diesel. This design allows much greater flexibility and safety in the unlikely event that gas is unavailable. As noted above, to the extent that the Wartsila generator engines are ever operated on exclusively diesel, the fuel usage will be maintained at less than 48,417 gallons per year.

EPA March 30, 2006; Question 1: *The application implies that the FSRU will have a continuous supply of LNG and therefore will have a continuous supply of BOG on which to operate the main generator engines. However, that fact does not appear to be explicitly stated anywhere in the permit application. Please confirm that under normal operations, the intent is for the FSRU to have a constant supply of BOG.*

The intent is for the FSRU to have a continuous supply of boil-off gas ("BOG"). However, if the FSRU were to ever not have adequate LNG in storage to generate the needed BOG, one of the Wartsila generator engines would be capable of operating on diesel long enough to shut down (or start up).

SCAQMD Question 1: *I also found an error in their emission calculations for the large 8 MW dual-fuel generators (App. G2, Table FSRU 5) on board the FSRU (floating terminal) that result in underestimating all generator emissions by 10% percent. The EPS Method 19 F-factor they used of 8713 (actually should be 8710) dscf/MMBtu of natural gas burned is based on MMBtu of higher heating value (HHV), but I believe the Wartsila specs (7239 Btu/kW-hr and 47.1% eff.) they used to compute the MMBtu/hr consumed are based on lower heating value of natural gas. The stated efficiency and heat rate of the engines is impossible based on HHV (and even questionable high based on LHV), therefore they are probably based on lower heating value,*



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*which is customary in the engine industry. Since HHV is about 10% more than LHV for natural gas, the calculated heat input rates, exhaust flowrates and mass emissions will be about 10% higher if the Wartsila specs are converted to HHV.*

SCAQMD's comment breaks down into two points. First, SCAQMD suggested that BHP erred in calculating the F-factor. South Coast suggested it should be 8710 instead of 8713. This comment is incorrect. The Method 19 F-factor is corrected to reflect the fact that the engines fire 99.4% gas and 0.6% diesel pilot fuel (heat input basis). When this mix and the fuel specific F-factors in Table 19-2 are taken into account, the value used in the application are accurate, as demonstrated below:

$$F_d = (0.006)(9190) + (0.994)(8710) = 8713 \text{ dscf/MMBtu}$$

Also, for the Wartsila generator engines, the sulfur content of the 1 ppmv sulfur gasified LNG fuel is corrected for 0.74% (fuel mass basis) of 15 ppmw sulfur California diesel pilot fuel. This yields an SO<sub>2</sub> correction factor of 1.0484, about 5% more than burning only gasified LNG. The 0.994/0.006 (heat input) split applies only to the Wartsila 9L50DFs on gas.

Second, South Coast suggests that the emission estimates were off due to our applying HHV to an LHV-based emission factor. Emissions of NO<sub>x</sub>, VOC, CO, PM<sub>10</sub>, and CO<sub>2</sub> were not underestimated. The Wartsila emission factors for NO<sub>x</sub>, VOC, CO, PM<sub>10</sub>, and CO<sub>2</sub> are in mass per unit output (i.e., g/kw-hr), not mass per unit input (e.g., lb/MMBtu). These factors are unaffected by heat input, i.e., LHV or HHV of fuel gas. Thus, these emissions are correctly calculated. However, the reviewer's comment is accurate in relation to the SO<sub>2</sub> emissions which are based on mass per unit input. These emissions increase slightly as the result of correcting LHV to HHV. Correcting LHV to HHV increases the heat rate by 10%, from 7239 to 7963 Btu/kw-hr (42.9% efficiency dual fuel mode) which also increases heat input from 179.17 to 197.08 MMBtu/hr for all three (3) engines. Since SO<sub>2</sub> is concentration-based, FSRU SO<sub>2</sub> increases from 0.41 to 0.42 tpy. It is worth noting that since heat input increases, stack velocity also increases from 53.6 to 59.0 m/sec, thus improving dispersion. These changes are reflected in the revised emissions inventory spreadsheets included with this letter.

SCAQMD Question 2: *Also, for the tugs and crew boats they are using EPA emission factors for 4-cycle, lean-burn natural gas engines. But these vessels will be compression-ignition, dual-fuel engines (with diesel pilot fuel) which can have much higher NO<sub>x</sub> emissions than what was calculated. Since they are dedicated vessels, they should get actual engine specs like they did*



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*for the equipment on the FSRU. (BHP told us in the meeting they think they will may get even lower NOx engines (1.3 g/kW-hr or 1.0 g/bhp-hr) from Wartsila. This is very good, but If so, it should be a committed mitigation measure.)*

The South Coast commenter suggests that BHP obtain actual engine specifications for the tugs. As South Coast indicates, in response to CARB's request that BHP find additional mitigation for the vessel emissions occurring in federal waters, the company has identified and is committing to the use of Wartsila (or equivalent) engines in the tugs. This commitment has a substantial impact on the emissions attributable to the tugs. Although the low amount of tug traffic that occurs in District waters means that this has relatively small impacts to the stationary source emission inventory, it does result in a reduction. This is reflected in the updated emissions inventory included with this letter. Because the majority of NOx emissions in Federal waters were attributable to the tugs, the primary impact of this commitment is to reduce NOx emissions in Federal waters by roughly 60 tons per year. BHP appreciates South Coast's recognition of this achievement.

Emissions Inventory Spreadsheets: As noted above, BHP is submitting with this letter a revised set of the emissions inventory spreadsheets. Each page identifies the revision date for easy reference. These sheets should replace the contents of Appendix A and Appendix C in their entirety.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Thomas R. Wood

TRW:nh

cc: Renee Klimezak  
Rick Abel  
Kevin Wright

Attachments: Errata Sheet  
Updated Emissions Inventory Spreadsheets (App. A & C)

**ATTACHMENT 1**  
**ERRATA SHEET DATED APRIL 7, 2006**



**Errata Sheet**  
**BHP Billiton LNG International Inc.**  
**Preconstruction Air Permit Application for Cabrillo Port**  
**April 7, 2006**

At the request of EPA, BHP Billiton LNG International Inc. (BHP) conducted a review of the air quality permit application submitted to EPA Region 9 in December 2005. EPA had queried several points in the application and requested that BHP review the document and submit an Errata report identifying any changes or corrections. Based on this review, BHP has identified the following corrections to the application:

- 1.) Appendix A of the application contains the emission calculation spreadsheets. Appendix A, Tables FW 1 and DW 1 incorrectly identify the pilot fuel used when burning natural gas as "biodiesel." The pilot fuel is correctly identified as "diesel." In response to updated information about the tug engines, BHP has prepared new emissions calculations spreadsheets that reflect this correction.
- 2.) Diesel Storage Tank Capacity: The diesel tank capacity was identified as 144,500 gallons in the text of the application but appeared as slightly different values in the emissions inventory spreadsheets. The correct storage capacity is 144,500 gallons. The new emissions calculations spreadsheets have been revised to reflect this value consistently.
- 3.) Diesel Usage: While not an error in the application, BHP wanted to clarify that the Wartsila generator engines require limited time operating solely on diesel in order to periodically test the four engines for emergency preparedness purposes and to allow limited operation if the gas supply were interrupted. Total operations will not exceed the equivalent of firing one engine at full load for 100 hours per year. This equates to a maximum of 48,417 gallons of diesel per year for operation of the engines solely on diesel. This is separate from the diesel used as pilot fuel when the engines are operating on gas. BHP believes that it will be more straightforward to track the operation of the engines solely on diesel by monitoring the gallons of fuel used per year in that mode.
- 4.) Crew Boat Trips: In the application, BHP states at pages 3-4 and 3-5 that "The crewboat will conduct approximately 2.5 round trips per week." The correct number of projected crewboat trips is 182 round trips per year or 3.5 round trips per week. This is accurately reflected in the new emissions calculations spreadsheets.
- 5.) Material Handling Crane: In the application, BHP states at page 2-10 that the material handling crane will be diesel fired, while at 3-4 it is stated that the material handling crane will be electric. The material handling crane will be electric (or electro-hydraulic), not diesel fired.

**ATTACHMENT 2**  
**REVISED APPENDIX A**

**The Appendix A denoted “Revised 4/6/06” should replace the Appendix A in the December 2005 Minor New Source Review Construction Permit Application in its entirety.**

## Operating Emissions Summary

Stationary Source (FSRU)										
Qty.	Description	Rating (each)	Fuel	NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
3	Wartsila 9L50DF Main Generators	8250 KW	Gas / CA Diesel	12.2	24.5	20.8	0.1	8.1	54,279	6.0
1	Wartsila 9L50DF Backup Generator	8250 KW	Gas / CA Diesel	1.9	0.3	0.2	0.0	0.1	473	0.0
8	Sub-X Submerged Combustion Vaporizers	115 mmBTU/hr	Gas Only	48.9	3.5	148.9	0.3	3.8	215,271	-
4	Emergency Fire Pump / Generator	600 / 4200 KW	CA Diesel	3.0	0.4	1.9	0.0	0.1	370	-
1	Freefall Lifeboat	56 KW	CA Diesel	0.0	0.0	0.0	0.0	0.0	2	-
1	Diesel Fuel Storage Tank	144,500 gallons	CA Diesel	-	0.0	-	-	-	-	-
Total Emissions - Stationary Source (FSRU)				66.1	28.7	171.7	0.42	12.1	270,395	6.1

Vessels in Federal Waters										
Qty.	Description	Rating (each)	Fuel	NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
2	Tug Supply Boat	15,000 BHP Mains	Gas / CA Diesel	33.3	12.7	47.1	0.0	1.6	11,476	-
1	Crew Boat	1,500 BHP Mains	Gas Only	1.5	0.3	1.4	0.0	0.0	278	-
1	LNG Carrier	60,000 BHP Total	Gas / CA Diesel	61.9	8.4	40.0	0.0	0.8	7,893	-
Total Emissions - Vessel in Federal Waters				96.7	21.4	88.5	0.03	2.4	19,648	-

Vessels in District (State) Waters										
Qty.	Description	Rating (each)	Fuel	NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
2	Tug Supply Boat	15,000 BHP Mains	Gas / CA Diesel	0.26	0.10	0.37	0.00	0.01	92	-
1	Crew Boat	1,500 BHP Mains	Gas Only	0.31	0.06	0.29	0.00	0.01	57	-
Total Emissions - Vessel in District (State) Waters				0.57	0.16	0.66	0.00	0.02	148	-

All Project Elements										
Total Emissions - All Project Elements				NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
Tons per Year				163.3	50.3	260.9	0.449	14.5	290,191	6.1
Tons per Day				0.45	0.14	0.71	0.001	0.04	795	0.02
Pounds per Day				895	275	1,430	2.5	79.5	n/a	33.2

Table No.	Table Name
Table FSRU 1	SCV and ICE Fuel Usage
Table FSRU 2	Equipment Controlled Emissions Summary
Table FSRU 3	Equipment Uncontrolled Emissions Summary
Table FSRU 4	Release Parameters
Table FSRU 5	Wartsila 9L50DF Controlled Emissions Summary
Table FSRU 6	Wartsila 9L50DF Uncontrolled Emissions Summary
Table FSRU 7	Wartsila 9L50DF Diesel Emissions Controlled Summary
Table FSRU 8	Wartsila 9L50DF Diesel Emissions Uncontrolled Summary
Table FSRU 9	SCV Controlled Emissions Summary
Table FSRU 10	SCV Uncontrolled Emissions Summary
Table FSRU 11	Firewater Pump Emissions Summary
Table FSRU 12	Emergency Generator Emissions Summary
Table FSRU 13	Freefall Lifeboat Emissions Summary
Table FSRU 14	Diesel Storage Tank Emissions Summary

Table FSRU 1: SCV and ICE Fuel Usage

Quantity	Description	Rating (each)	LNG Fuel Usage			
			mmBTU/hr	mcf/hr	hrs/yr	mmcf/yr
3	Wartsila 9L50DF Main Generators	8250 KW	100.21	99.45	8760	871
8	Sub-X Submerged Combustion Vaporizers	115 mmBTU/hr	460.00	456.53	8760	3,999
Total Usage			560.21	555.98		4,870
Total LNG Throughput (see notes)						292,000
Percent of Total Usage						1.67%

Device Notes:

FSRU throughput 800 mmcf/day, 365 days/yr, 292 mmcf/yr total  
Three 9L50DF main generators (8.25 MW each) operating at 100% load for hourly max, 110,903 MW-hr annual total, 99.4% gas fuel, 0.6% diesel pilot fuel (heat input)  
Four SCVs operating at 100% capacity factor for 8,760 hrs/yr, low-NOx burners

Table FSRU 2: Equipment Controlled Emissions Summary

Quantity	Description	Rating (each)	Fuel	Annual Emissions, tons per year						
				NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
3	Wartsila 9L50DF Main Generators	8250 KW	Gas / CA Diesel	12.2	24.5	20.8	0.08	8.1	54,279	6.01
1	Wartsila 9L50DF Backup Generator	8250 KW	Gas / CA Diesel	1.9	0.3	0.2	0.01	0.1	473	0.05
8	Sub-X Submerged Combustion Vaporizers	115 mmBTU/hr	Natural Gas	48.9	3.5	148.9	0.33	3.8	215,271	-
2	Emergency Fire Pump / Generator	600 / 4200 KW	CA Diesel	3.0	0.4	1.9	0.00	0.1	370	-
1	Freefall Lifeboat	56 KW	CA Diesel	0.0	0.0	0.0	0.00	0.0	2	-
1	Diesel Fuel Storage Tank	144,500 gallons	CA Diesel	-	0.03	-	-	-	-	-
<b>Total Emissions</b>				<b>66.1</b>	<b>28.7</b>	<b>171.7</b>	<b>0.42</b>	<b>12.1</b>	<b>270,395</b>	<b>6.06</b>

Device Notes:

FSRU throughput 800 mmcf/day, 365 days/yr, 292 mmcf/yr total

Three 9L50DF main generators (8.25 MW each) operating at 100% load for hourly max, 110,903 MW-hr annual total, 99.4% gas fuel, 0.6% diesel pilot fuel (heat input)

Backup 9L50DF generator operating at 100% load for 100 machine hours per year, diesel fuel, 2006 Tier 2 standards

Four SCVs operating at 100% capacity factor for 8,760 hrs/yr, low-NOx burners

Emergency fire pump and generator operating at 100% load for 100 machine hours each per year, diesel fuel, 2006 Tier 2 standards

Three Life Boats exercising at 100% load for 50 machine hours per year total, diesel fuel, 2006 Tier 2 standards

Diesel Storage Tank, 144,500 gallon capacity, throughput based on diesel fuel usage defined above for applicable devices

**Table FSRU 3: Equipment Uncontrolled Emissions Summary**

Quantity	Description	Rating (each)	Fuel	Annual Emissions, tons per year						
				NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>	NH <sub>3</sub>
3	Wartsila 9L50DF Main Generators	8250 KW	Gas / CA Diesel	183.4	52.7	129.6	0.1	8.1	54,279	-
1	Wartsila 9L50DF Backup Generator	8250 KW	Gas / CA Diesel	13.4	0.6	0.9	0.0	0.1	473	-
8	Sub-X Submerged Combustion Vaporizers	115 mmBTU/hr	Natural Gas	97.9	3.5	119.1	0.3	3.8	215,271	-
2	Emergency Fire Pump / Generator	600 / 4200 KW	CA Diesel	3.0	0.4	1.9	0.0	0.1	370	-
1	Freefall Lifeboat	56 KW	CA Diesel	0.0	0.0	0.0	0.0	0.0	2	-
1	Diesel Fuel Storage Tank	144,500 gallons	CA Diesel	-	0.03	-	-	-	-	-
<b>Total Emissions</b>				<b>297.6</b>	<b>57.2</b>	<b>251.5</b>	<b>0.4</b>	<b>12.1</b>	<b>270,395</b>	<b>-</b>

Device Notes:

FSRU throughput 800 mmcf/day, 365 days/yr, 292 mmmcf/yr total

Three 9L50DF main generators (8.25 MW each) operating at 100% load for hourly max, 110,903 MW-hr annual total, 99.4% gas fuel, 0.6% diesel pilot fuel (heat input)

Backup 9L50DF generator operating at 100% load for 100 machine hours per year, diesel fuel, 2006 Tier 2 standards

Four SCVs operating at 100% capacity factor for 8,760 hrs/yr, low-NOx burners

Emergency fire pump and generator operating at 100% load for 100 machine hours each per year, diesel fuel, 2006 Tier 2 standards

Three Life Boats exercising at 100% load for 50 machine hours per year total, diesel fuel, 2006 Tier 2 standards

Diesel Storage Tank, 144,500 gallon capacity, throughput based on diesel fuel usage defined above for applicable devices

**Table FSRU 4: Release Parameters**

Release Parameter	Units	Main Gens	Backup Gen	Vaporizers	Emerg. Pump	Emerg. Gen	Life Boat
Fuel	Type	Dual Fuel	Diesel	Gas	Diesel	Diesel	Diesel
Heat Input	mmBTU/hr	197.1	66.3	460.0	5.9	35.8	0.64
Wet Fd Factor	wscf/mmBTU	10,608	10,320	10,610	10,320	10,320	10,320
Oxygen Content	percent	15%	15%	3%	15%	15%	15%
Exhaust Temperature	Deg F	800	800	70	800	800	800
Stack Diameter	inches	68.2	39.4	78.7	10.0	26.0	3.0
Stack Area	sq. ft.	25.36	8.45	33.82	0.55	3.69	0.05
Stack Flow	wscf/min	123,434	40,424	94,976	3,565	21,835	388
Stack Flow	wacf/min	294,558	96,467	95,336	8,507	52,106	926
Stack Velocity	ft/min	11,614	11,411	2,819	15,597	14,132	18,871
Release Height	meters	33	33	35	25	25	1
Release Diameter	meters	1.73	1.00	2.00	0.25	0.66	0.08
Release Velocity	meters/sec	59.0	58.0	14.3	79.2	71.8	95.9
Release Temperature	degrees K	700	700	294	700	700	700

Downwash Dimensions	Units	FSRU Hull
Height	meters	21
Width (min horizontal)	meters	65
Length (max horizontal)	meters	286



**Table FSRU 5: Wartsila 9L50DF Controlled Emissions Summary**

SIC	1321	Dual Fuel ICE generator, Wartsila 50DF
PROCESS EQPT DESCRIPTION		Scarborough LNG, 99.7% methane, 1 ppmv S (with 0.6% diesel pilot charge, 15 ppmw S)
FUEL TYPE/PROCESS INFO	110903	MW-hrs
TOTAL YEARLY PROCESS RATE	24.75	MW
HOURLY PROCESS RATE	PT071	MW-hrs
PROCESS UNITS	1007.6	BTU/cf
HIGHER HEATING VALUE	8760	hrs/yr
OPERATING SCHEDULE	7963	BTU/KW-hr
HEAT RATE	42.9%	percent
CONVERSION EFFICIENCY	197.08	mmBTU/hr
HEAT INPUT	8713	dscf/mmBTU
DRY Fd	6.08	mmdscf/hr
EXHAUST FLOW		
EMITTENT	PPMV	CORR FACTOR
NAME	CTL EF LBS/UNIT	ACTUAL LBS/YR
Nitrogen Oxides (as NO <sub>2</sub> )	0.2205	24,450
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.4409	48,900
Carbon Monoxide (CO)	0.3748	41,565
Sulfur Dioxide (SO <sub>2</sub> )	0.0014	153
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.1459	16,186
Carbon Dioxide (CO <sub>2</sub> )	978.8576	108,558,240
Ammonia Slip (NH <sub>3</sub> )	0.1084	12,026
ACTUAL TONS/YR	ACTUAL LBS/HR	RATE g/kw-hr
12.23	5.46	0.100
24.45	10.91	0.200
20.78	9.28	0.170
0.08	0.03	0.0006
8.09	3.61	0.0662
54,279	24,227	444
6.01	2.68	0.049
0.075		0.037

**Wartsila Emission Factors (BACT)**

NO<sub>x</sub> = 0.10 g/kw-hr (Wartsila Specification 16 March 2006)  
VOC = 0.20 g/kw-hr (Wartsila Specification 16 March 2006)  
CO = 0.17 g/kw-hr (Wartsila Specification 16 March 2006)  
PM<sub>10</sub> = 0.0662 g/kw-hr (Wartsila Specification 16 March 2006)  
CO<sub>2</sub> = 444 g/kw-hr (Wartsila Report 4 July 2003)

Pilot Diesel Fuel Usage 38,668 gal/yr

Average generation	110,903	MW-hrs/yr
Maximum generation	216,810	MW-hrs/yr
Average Capacity Factor	51.2%	percent

**Table FSRU 6: Wartsila 9L50DF Uncontrolled Emissions Summary**

SIC

1321

Dual Fuel ICE generator, Wartsila 50DF

Scarborough LNG, 99.7% methane, 1 ppmv S (with 0.6% diesel pilot charge, 15 ppmw S)

110903

MW-hrs

from BHP estimates

24.75

MW

from BHP estimates

PT071

MW-hrs

Scarborough LNG specification

1007.6

BTU/cf

hrs/yr

8760

BTU/KW-hr

Wartsila Spec 0047057-S504, 13 May 05, corrected to HHV (110% of LHV)

7963

percent

HHV correction applies

42.9%

mmBTU/hr

USEPA Method 19, corrected for 0.6% diesel pilot fuel heat input

197.08

dscf/mmBTU

8713

mmdscf/hr

6.08

EMITTENT

NAME

EMITTENT

PPMV

CORR

FACTOR

CTL EF

LBS/UNIT

ACTUAL

LBS/YR

ACTUAL

TONS/YR

ACTUAL

LBS/HR

RATE

g/kw-hr

RATE

g/bhp-hr

Nitrogen Oxides (as NO<sub>2</sub>)

112.7

1.0000

3.3070

366,751

183.38

81.85

1.500

1.119

Reactive Hydrocarbons (ROC) as CH<sub>4</sub>

93.1

1.0000

0.9502

105,380

52.69

23.52

0.431

0.321

Carbon Monoxide (CO)

130.8

1.0000

2.3369

259,171

129.59

57.84

1.060

0.790

Sulfur Dioxide (SO<sub>2</sub>)

0.034

1.0484

0.0014

153

0.08

0.03

0.0006

0.0005

Particulates (as PM<sub>10</sub>) (grains/dscf)

0.0042

1.0000

0.1459

16,186

8.09

3.61

0.0662

0.049

Carbon Dioxide (CO<sub>2</sub>)

3.49%

1.0000

978.8576

108,558,240

54,279

24,227

444

331

Ammonia Slip (NH<sub>3</sub>)

Wartsila Emission Factors (Uncontrolled)

NO<sub>x</sub> = 1.50 g/kw-hr (Wartsila Specification 16 March 2006)  
VOC = 0.431 g/kw-hr (Wartsila Specification 16 March 2006)  
CO = 1.06 g/kw-hr (Wartsila Specification 16 March 2006)  
PM<sub>10</sub> = 0.0662 g/kw-hr (Wartsila Specification 16 March 2006)  
CO<sub>2</sub> = 444 g/kw-hr (Wartsila Report 4 July 2003)

**Table FSRU 7: Wartsila 9L50DF Diesel Emissions Controlled Summary**

SIC	1321	Dual Fuel ICE generator, Wartsila 50DF
PROCESS EQPT DESCRIPTION	California diesel, 15 ppmw S	
FUEL TYPE/PROCESS INFO	825 MW-hrs	from BHP estimates
TOTAL YEARLY PROCESS RATE	8.25 MW	
HOURLY PROCESS RATE	PT071 MW-hrs	
PROCESS UNITS	137030 BTU/gal	USEPA AP-42
HIGHER HEATING VALUE	100 hrs/yr	
OPERATING SCHEDULE	8042 BTU/KW-hr	Wartsila Spec 0047057-S504, 13 May 05
HEAT RATE	42.4% percent	
CONVERSION EFFICIENCY	66.35 mmBTU/hr	
HEAT INPUT	9190 dscf/mmBTU	USEPA Method 19
DRY Fd	2.16 mmdscf/hr	
EXHAUST FLOW		
EMITTENT NAME	EMITTENT PPMV	CORR FACTOR
Nitrogen Oxides (as NO <sub>2</sub> )	150	1.0000
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	60	1.0000
Carbon Monoxide (CO)	25	1.0000
Sulfur Dioxide (SO <sub>2</sub> )	0.29	1.0000
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0091	1.0000
Carbon Dioxide (CO <sub>2</sub> )	3.83%	1.0000
Ammonia Slip (NH <sub>3</sub> )	10	1.0000
		CTLEF LBS/UNIT
		3,868
		538
		392
		10
		280
		945,788
		95
		0.1155
		ACTUAL LBS/YR
		1.93
		0.27
		0.20
		0.01
		0.14
		473
		0.05
		ACTUAL LBS/HR
		38.68
		5.38
		3.92
		0.10
		2.80
		9,458
		0.95
		RATE g/kw-hr
		2.127
		0.296
		0.216
		0.006
		0.154
		520
		0.052
		RATE g/bhp-hr
		1.586
		0.221
		0.161
		0.004
		0.115
		388
		0.039

Wartsila Emission Factors (Controlled)

NO<sub>x</sub> = 150 ppm, 2.127 g/kw-hr (Wartsila Spec 0047057-S504, 13 May 05)  
VOC = 60 ppm, 0.296 g/kw-hr (Wartsila Spec 0047057-S504, 13 May 05)  
CO = 25 ppm, 0.216 g/kw-hr (Wartsila Spec 0047057-S504, 13 May 05)  
PM<sub>10</sub> = 0.154 g/kw-hr (Wartsila Specification 16 March 2006)  
CO<sub>2</sub> = 520 g/kw-hr (Wartsila)

**Table FSRU 8: Wartsila 9L50DF Diesel Emissions Uncontrolled Summary**

SIC	1321	Dual Fuel ICE generator, Wartsila 50DF						
PROCESS EQPT DESCRIPTION	California diesel, 15 ppmw S							
FUEL TYPE/PROCESS INFO	825 MW-hrs							
TOTAL YEARLY PROCESS RATE	8.25 MW	from BHP estimates						
HOURLY PROCESS RATE	PT071 MW-hrs							
PROCESS UNITS	137030 BTU/gal	USEPA AP-42						
HIGHER HEATING VALUE	100 hrs/yr							
OPERATING SCHEDULE	8042 BTU/KW-hr	Wartsila Spec 0047057-S504, 13 May 05						
HEAT RATE	42.4% percent							
CONVERSION EFFICIENCY	66.35 mmBTU/hr							
HEAT INPUT	9190 dscf/mmBTU	USEPA Method 19						
DRY Fd	2.16 mmdscf/hr							
EXHAUST FLOW								
EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTL EF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	1037	1.0000	32.4081	26,737	13.37	267.37	14.700	10.962
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	132	1.0000	1.4352	1,184	0.59	11.84	0.651	0.485
Carbon Monoxide (CO)	119	1.0000	2.2708	1,873	0.94	18.73	1.030	0.768
Sulfur Dioxide (SO <sub>2</sub> )	0.3	1.0000	0.0125	10	0.01	0.10	0.006	0.004
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0091	1.0000	0.3395	280	0.14	2.80	0.154	0.115
Carbon Dioxide (CO <sub>2</sub> )	3.83%	1.0000	1146.4098	945,788	473	9,458	520	388
Ammonia Slip (NH <sub>3</sub> )								

Wartsila Emission Factors (Uncontrolled)

NO<sub>x</sub> = 14.70 g/kw-hr (Wartsila Specification 16 March 2006)

VOC = 0.651 g/kw-hr (Wartsila Specification 16 March 2006)

CO = 1.03 g/kw-hr (Wartsila Specification 16 March 2006)

PM<sub>10</sub> = 0.154 g/kw-hr (Wartsila Specification 16 March 2006)

CO<sub>2</sub> = 520 g/kw-hr (Wartsila)

**Table FSRU 9: SCV Controlled Emissions Summary**

SIC	1321	Submerged Combustion Vaporizer, Selas Sub-X, 120-180 ton LNG/hr, Low NO <sub>x</sub> Burner
PROCESS EQPT DESCRIPTION		Scarborough LNG, 99.7% methane, 1 ppmv S
FUEL TYPE/PROCESS INFO	3999.206	
TOTAL YEARLY PROCESS RATE	0.456530	
HOURLY PROCESS RATE	PT074	Million Cubic Feet Burned
PROCESS UNITS	1007.6	mmBTU/MMcf
HIGHER HEATING VALUE	8760	hrs/yr
OPERATING SCHEDULE	4.00	Average
NUMBER OF DEVICES	115.000	mmBTU/hr
UNIT RATING	460.00	mmBTU/hr
HEAT INPUT	8710	dsct/mmBTU
DRY Fd	4.68	USEPA Method 19
EXHAUST FLOW		mmdsct/hr

EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTLEF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE lb/mmBTU
Nitrogen Oxides (as NO <sub>2</sub> )	20.0	1.0000	24.467	97,850	48.93	11.17	0.0243
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	4.1	1.0000	1.745	6,977	3.49	0.80	0.0017
Carbon Monoxide (CO)	100.0	1.0000	74.466	297,805	148.90	34.00	0.0739
Sulfur Dioxide (SO <sub>2</sub> )	0.10	1.0000	0.166	664	0.33	0.08	0.0002
Particulates (as PM <sub>10</sub> ) (grains/dsct)	0.0013	1.0000	1.900	7,598	3.80	0.87	0.0019
Carbon Dioxide (CO <sub>2</sub> )	9.2%	1.0000	107656.700	430,541,325	215270.66	49148.55	106.8447
Ammonia Slip (NH <sub>3</sub> )							

**Emission Factors @ 3% oxygen**

NO<sub>x</sub> = 20 ppmv (Selas Specification)  
 ROC = 4.1 ppmv (Costain Report)  
 CO = 100 ppmv (Selas Specification)  
 PM<sub>10</sub> = 1.9 lb/MMcf (AP-42 Table 1.4-2, non-condensable filterable fraction, condensibles remain in 70 F water solution)  
 CO<sub>2</sub> = 9.2% (Selas Specification, 6.6% @ 8% oxygen)

**Device Notes:**

FSRU throughput 800 mmcf/day, 365 days/yr, 292 mmcf/yr total  
 SCV sendout rate = 200 mmcf/day (guarantee)

Throughput, mmcf/day	800 design
SCV Sendout, mmcf/day each	200 guarantee
Equivalent SCVs Operating	4.00 average

**Table FSRU 10: SCV Uncontrolled Emissions Summary**

SIC	1321	Submerged Combustion Vaporizer, Selas Sub-X, 120-180 ton LNG/hr, Standard Burner
PROCESS EQPT DESCRIPTION		Scarborough LNG, 99.7% methane, 1 ppmv S
FUEL TYPE/PROCESS INFO	3999.206	
TOTAL YEARLY PROCESS RATE	0.456530	
HOURLY PROCESS RATE	PT074	Million Cubic Feet Burned
PROCESS UNITS	1007.6	mmBTU/mmcf
HIGHER HEATING VALUE	8760	hrs/yr
OPERATING SCHEDULE	4.00	Average
NUMBER OF DEVICES	115.000	mmBTU/hr
UNIT RATING	460.00	mmBTU/hr
HEAT INPUT	8710	dscf/mmBTU
DRY Fd	4.68	USEPA Method 19
EXHAUST FLOW		mmdscf/hr

EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTLEF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE lb/mmBTU
Nitrogen Oxides (as NO <sub>2</sub> )	40.0	1.0000	48.935	195,701	97.85	22.34	0.0486
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	4.1	1.0000	1.745	6,977	3.49	0.80	0.0017
Carbon Monoxide (CO)	80.0	1.0000	59.573	238,244	119.12	27.20	0.0591
Sulfur Dioxide (SO <sub>2</sub> )	0.10	1.0000	0.166	664	0.33	0.08	0.0002
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0013	1.0000	1.900	7,598	3.80	0.87	0.0019
Carbon Dioxide (CO <sub>2</sub> )	9.2%	1.0000	107656.700	430,541,325	215270.66	49148.55	106.8447
Ammonia Slip (NH <sub>3</sub> )							

Emission Factors @ 3% oxygen

NO<sub>x</sub> = 40 ppmv (Selas Specification)  
 ROC = 4.1 ppmv (Costain Report)  
 CO = 80 ppmv (Selas Specification)  
 PM<sub>10</sub> = 1.9 lb/mmcf (AP-42 Table 1.4-2, non-condensable filterable fraction, condensibles remain in 70 F water solution)  
 CO<sub>2</sub> = 9.2% (Selas Specification, 6.6% @ 8% oxygen)

Device Notes:

FSRU throughput 800 mmcf/day, 365 days/yr, 292 mmmcf/yr total  
 SCV sendout rate =200 mmscf/day (guarantee)

Throughput, mmcf/day	800 design
SCV Sendout, mmcf/day each	200 guarantee
Equivalent SCVs Operating	4.00 average







**Table FSRU 13: Freefall Lifeboat Emissions Summary**

SIC	1321	Freefall Lifeboat Engine, 75 BHP (56 KW)						
PROCESS EQPT DESCRIPTION	Freefall Lifeboat Engine, 75 BHP (56 KW)							
FUEL TYPE/PROCESS INFO	California diesel, 15 ppmw S							
TOTAL YEARLY PROCESS RATE	2.8 MW-hrs	from BHP estimates						
HOURLY PROCESS RATE	0.056 MW							
PROCESS UNITS	PT071 MW-hrs							
HIGHER HEATING VALUE	137030 BTU/gal	USEPA AP-42						
OPERATING SCHEDULE	50 hrs/yr							
HEAT RATE	11377 BTU/KW-hr							
CONVERSION EFFICIENCY	30.0% percent							
HEAT INPUT	0.64 mmBTU/hr							
DRY Fd	9190 dscf/mmBTU	USEPA Method 19						
EXHAUST FLOW	0.02 mmdscf/hr							
EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTLEF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	324	1.0000	14.3301	40	0.02	0.80	6.500	4.847
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	143	1.0000	2.2046	6	0.00	0.12	1.000	0.746
Carbon Monoxide (CO)	410	1.0000	11.0232	31	0.02	0.62	5.000	3.729
Sulfur Dioxide (SO <sub>2</sub> )	0.3	1.0000	0.018	0	0.00	0.00	0.008	0.006
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0167	1.0000	0.8819	2	0.00	0.05	0.400	0.298
Carbon Dioxide (CO <sub>2</sub> )	3.65%	1.0000	1543.2439	4,321	2	86	700	522

\* USEPA Tier 2 Standards (>37 kw, <75 kw)

NO<sub>x</sub> + ROC = 7.5 g/kw-hr

CO = 5.0 g/kw-hr

PM<sub>10</sub> = 0.4 g/kw-hr

CO<sub>2</sub> = 700 g/kw-hr (AP-42, Table 3.3-1)

Diesel Fuel Usage 232 gal/yr



**Table FSRU 14: Diesel Storage Tank Emissions Summary**

SCAQMD AP-42 Fixed Roof Eqns.		Value	Units
Number of Tanks		1	
Tank Diameter, D		40.000	ft
Shell Height, Hs		15.380	ft
Vapor Outage Headspace, Hvo		7.690	ft
Tank Capacity, C		3442.300	bbl
Throughput, Q		2803	bbl/yr
Turnovers, N		0.814	#/yr
True Vapor Pressure, P		0.009	psia
Vapor Molecular Weight, Mv		130	lb/lb-mole
Storage Temperature, Ts		65	F
Delta Temp, Tv		25	F
Paint Alpha, a		0.1700	a
Product Factor, Kp		1.0000	
Vapor Space Volume, Vv		9663.5390	ft3
Vapor Density, Wv		0.0002	lb/ft3
Vapor Space Expansion Factor, Ke		0.0352	
Vapor Saturation Factor, Kv		0.9963	
Turnover Factor, Kn		1.0000	
Beathing Loss, Lb		25.6641	lb/yr
Working Loss, Lw		3.2799	lb/yr
Total Tank Losses, Lt		28.9440	lb/yr
Fugitive Components		lb/yr	EF, lb/hr
Valves, Gas		0.0000	0.012
Valves, Light Liquid		0.0000	0.016
Valves, Heavy Liquid		67.0140	0.00051
Flanges, General		31.5360	0.0018
Pump Seals, Light Liquid		0.0000	0.11
Pump Seals, Heavy Liquid		823.4400	0.047
Pressure Relief Valves		0.0000	0.23
Low Pressure Correction Factor		0.0333	
Total Fugitive Losses, Lf		30.7238	
Total Emissions, Et		59.6678	lb/yr

**Index: District Waters Vessel Emission Summary Tables**

<b>Table No.</b>	<b>Table Name</b>
Table DW 1	District Waters Vessels Emissions Summary
Table DW 2	Tug/Supply Vessel Main Engine Emission Summary
Table DW 3	Tug/Supply Vessel Generator Engine Emission Summary
Table DW 4	Tug/Supply Vessel Activity Summary
Table DW 5	Crew Boat Main Engine Emission Summary
Table DW 6	Crew Boat Generator Engine Emission Summary
Table DW 7	Crew Boat Activity Summary

Table DW 1: District Waters Vessel Emissions Summary

Quantity	Description	Rating (each)	Fuel	Annual Emissions, tons per year				
				NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub> CO <sub>2</sub>
2	Tug Supply Boat	15,000 BHP Mains	Gasified LNG & CA Diesel	0.26	0.10	0.37	0.000	0.01 92
1	Crew Boat	1,500 BHP Mains	Gasified LNG	0.31	0.06	0.29	0.000	0.01 57
	<b>Total Emissions (gasified LNG &amp; CA diesel pilot fuel)</b>			<b>0.57</b>	<b>0.16</b>	<b>0.66</b>	<b>0.000</b>	<b>0.02 148</b>

Vessel Notes:

Tug Supply boat making 52 round trips to FSRU per year, time & load weighted engine operation

Crew boat making 182 round trips to FSRU per year, time & load weighted engine operation

Operating component in state waters only (inside 3-mile limit)

Tug Supply dual fuel is 99% gasified LNG / 1% CA diesel by weight (99.2% / 0.8% by heat input)

Crew boat is 100% gasified LNG

SIC  
PROCESS EQPT DESCRIPTION  
FUEL TYPE/PROCESS INFO  
TOTAL YEARLY PROCESS RATE  
HOURLY PROCESS RATE  
PROCESS UNITS  
HIGHER HEATING VALUE  
COMBINED ENGINE RATING  
LOAD FACTOR  
OPERATING SCHEDULE  
HEAT RATE  
CONVERSION EFFICIENCY  
HEAT INPUT  
DRY Fd  
EXHAUST FLOW

Tug Supply Main Generator Set Engines, 15,000 BHP, 2 vessels alternating port calls		
Scarborough LNG, 99.7% methane, 1 ppmv S & 15 ppmw S California diesel pilot charge		
174	MW-hrs	
3.36	MW	
PT071	MW-hrs	
1007.6	BTU/scf	
15000	BHP	from BHP estimates
30%	percent	from activity profile
52	hrs/yr	from activity profile
9751	BTU/KW-hr	
35.0%	percent	
32.72	mmBTU/hr	
8710	dscf/mmBTU	USEPA Method 19
1.010	mmdscf/hr	

Wartsila Emission Factors for Series 32DF Engines

VOC = 0.52 g/kw-hr (Warsila Report Specification 16 March 2006, corrected to 8% nonmethane per AP-42 Table 3.2-2)

$$SO_2 = 1.65 \text{ E-4 lb/mmBTU (for 1 ppmv S)}$$

CO<sub>2</sub> = 468 g/kw-hr (Wartsila Report 4 July 2003)

Tug Supply dual fuel is 99% gasified LNG / 1% CA diesel by weight (99.2% / 0.8% by heat input)  
Power output 234,000 BHP-hr/yr



**Table DW 4: Tug/Supply Vessel Activity Summary**

**Tug Supply**

<b>District Waters Transit</b>	<b>Miles</b>	<b>Speed</b>	<b>Time, hrs</b>	<b>Mains</b>	<b>Weighted</b>	<b>Mode</b>
Engine start & idle at dock	0	0	0.12	10%	1.2%	4.0%
Transit harbor zone outbound	0.75	5	0.15	14%	2.1%	7.0%
Due south to boundary	3.5	18.5	0.19	51%	9.7%	32.1%
Federal Waters						
Due north from boundary	3.5	18.5	0.19	51%	9.7%	32.1%
Transit harbor zone inbound	0.75	5	0.15	14%	2.1%	7.0%
Docking & engine stop	0	0	0.20	27%	5.4%	17.9%
<b>Composite</b>			<b>1.00</b>		<b>30%</b>	<b>100%</b>

**Cruising in District waters per week** **0.38**

Remarks - District Waters Transit

1 roundtrip/week = 52 roundtrips/year  
 52 trips/yr x 1 hr/trip = 52 hrs/yr @ 30% power on mains  
 ship generators run all the time, so  
 52 trips/yr x 1 hrs/trip = 52 hrs/yr @ 50% power

Start/Stop/Idle	21.9%
Harbor Transit	14.0%
Cruise to/from Boundary	64.1%
	100.0%



**Table DW 5: Crew Boat Main Engine Emissions Summary**

SIC	1321	PROCESS EQPT DESCRIPTION	Crew Boat Main Engines, 1500 BHP						
FUEL TYPE/PROCESS INFO			Scarborough LNG, 99.7% methane, 1 ppmv S						
TOTAL YEARLY PROCESS RATE	96		MW-hrs						
HOURLY PROCESS RATE	0.53		MW						
PROCESS UNITS	PT071		MW-hrs						
HIGHER HEATING VALUE	1007.6		BTU/scf						
COMBINED ENGINE RATING	1500		BHP						
LOAD FACTOR	47%		percent						
OPERATING SCHEDULE	182		hrs/yr						
HEAT RATE	9751		BTU/KW-hr						
CONVERSION EFFICIENCY	35.0%		percent						
HEAT INPUT	5.13		mmBTU/hr						
DRY Fd	8710		dscf/mmBTU						
EXHAUST FLOW	0.158		mm dscf/hr						
EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTL EF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr	
Nitrogen Oxides (as NO <sub>2</sub> )		165	1.0000	5.9128	566	0.283	3.109	2.682	2.000
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>		92	1.0000	1.1507	110	0.055	0.605	0.522	0.389
Carbon Monoxide (CO)		248	1.0000	5.4315	520	0.260	2.856	2.464	1.837
Sulfur Dioxide (SO <sub>2</sub> )		0.03	1.0000	0.0016	0	0.000	0.001	0.0007	0.0005
Particulates (as PM <sub>10</sub> ) (grains/dscf)		0.0023	1.0000	0.0975	9	0.005	0.051	0.044	0.033
Carbon Dioxide (CO <sub>2</sub> )			1.0000	1072.6571	102,634	51.317	563.925	487	363

**Gas Emission Factors (AP-42 Table 3.2-2)**

NO<sub>x</sub> = 2.682 g/kw-hr (CAT Series GLE Engines 2.0 g/bhp-hr)

VOC = 0.118 lb/mmBTU

CO = 0.557 lb/mmBTU

SO<sub>2</sub> = 1.65 E-4 lb/mmBTU (for 1 ppmv S)

PM<sub>10</sub> = 0.010 lb/mmBTU

CO<sub>2</sub> = 110 lb/mmBTU

**Table DW 6: Crew Boat Generator Engine Emissions Summary**

SIC	1321	Crew Boat Generator Engine, 150 BHP
PROCESS EQPT DESCRIPTION		Scarborough LNG, 99.7% methane, 1 ppmv S
FUEL TYPE/PROCESS INFO	10	MW-hrs
TOTAL YEARLY PROCESS RATE	0.06	MW
HOURLY PROCESS RATE	PT071	MW-hrs
PROCESS UNITS	1007.6	BTU/scf
HIGHER HEATING VALUE	150	BHP
COMBINED ENGINE RATING	50%	percent
LOAD FACTOR	182	hrs/yr
OPERATING SCHEDULE	9751	BTU/KW-hr
HEAT RATE	35.0%	percent
CONVERSION EFFICIENCY	0.55	mmBTU/hr
HEAT INPUT	8710	dscf/mmBTU
DRY Fd	0.017	USEPA Method 19
EXHAUST FLOW		mmdscf/hr

EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTL EF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr
Nitrogen Oxides (as NO <sub>2</sub> )	165	1.0000	5.9128	60	0.030	0.331	2.682	2.000
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	92	1.0000	1.1507	12	0.006	0.064	0.522	0.389
Carbon Monoxide (CO)	248	1.0000	5.4315	55	0.028	0.304	2.464	1.837
Sulfur Dioxide (SO <sub>2</sub> )	0.03	1.0000	0.0016	0	0.000	0.000	0.0007	0.0005
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0023	1.0000	0.0975	1	0.000	0.005	0.044	0.033
Carbon Dioxide (CO <sub>2</sub> )	3.12%	1.0000	1072.6571	10,919	5.459	59.992	487	363

Gas Emission Factors (AP-42 Table 3.2-2)

NO<sub>x</sub> = 2.682 g/kw-hr (CAT Series GLE Engines 2.0 g/bhp-hr)

VOC = 0.118 lb/mmBTU

CO = 0.557 lb/mmBTU

SO<sub>2</sub> = 1.65 E-4 lb/mmBTU (for 1 ppmv S)

PM<sub>10</sub> = 0.010 lb/mmBTU

CO<sub>2</sub> = 110 lb/mmBTU

Table DW 7: Crew Boat Activity Summary

Crew Boats	District Waters Transit	Miles	Speed	Time, hrs	Mains Weighted	Mode
	Engine start & idle at dock	0	0	0.12	13%	3.3%
	Transit harbor zone outbound	0.75	5	0.15	24%	7.7%
	Due south to boundary Federal Waters	3.5	18.5	0.19	90%	36.5%
	Due north from boundary	3.5	18.5	0.19	90%	36.5%
	Transit harbor zone inbound	0.75	5	0.15	24%	7.7%
	Docking & engine stop	0	0	0.20	19%	8.2%
	<b>District waters composite per trip</b>			<b>1.00</b>	<b>47%</b>	<b>100%</b>
	<b>Cruising in District waters per week</b>			<b>1.32</b>		
Remarks - District Waters Transit						
1 roundtrip/berthing = 2.5 per week + 1 crew change/week = 3.5 roundtrips/week or 182 roundtrips/year						
182 trips/yr x 1 hr/trip = 182 hrs/yr @ 47% power on mains						
ship generators run all the time, so						
182 trips/yr x 1 hrs/trip = 182 hrs/yr @ 50% power						
	Start/Stop/Idle					11.5%
	Harbor Transit					15.4%
	Cruise to/from Boundary					73.1%
						100.0%

## **Index: Federal Waters Vessel Emission Summary Tables**

<b>Table No.</b>	<b>Table Name</b>
Table FW 1	Federal Waters Vessels Emissions Summary
Table FW 2	Tug/Supply Vessel Main Engine Emission Summary
Table FW 3	Tug/Supply Vessel Generator Engine Emission Summary
Table FW 4	Tug/Supply Vessel Activity Summary
Table FW 5	Crew Boat Main Engine Emission Summary
Table FW 6	Crew Boat Generator Engine Emission Summary
Table FW 7	Crew Boat Activity Summary
Table FW 8	LNG Carrier Vessel Emission Summary
Table FW 9	LNG Carrier Vessel Activity Summary

Table FW 1: Federal Waters Vessels Emission Summary

Quantity	Description	Rating (each)	Fuel	Annual Emissions, tons per year					
				NO <sub>x</sub>	ROC	CO	SO <sub>2</sub>	PM <sub>10</sub>	CO <sub>2</sub>
2	Tug Supply Boat	15,000 BHP Mains	Gasified LNG & CA Diesel	33.3	12.7	47.1	0.02	1.6	11,476
1	Crew Boat	1,500 BHP Mains	Gasified LNG	1.5	0.3	1.4	0.00	0.0	278
1	LNG Carrier	60,000 BHP Total	Gasified LNG & CA Diesel	61.9	8.4	40.0	0.01	0.8	7,893
<b>Total Emissions (gasified LNG &amp; CA diesel pilot fuel)</b>				<b>96.7</b>	<b>21.4</b>	<b>88.5</b>	<b>0.03</b>	<b>2.4</b>	<b>19,648</b>

Vessel Notes:

Assist tugs (pair) conducting LNG carrier to FSRU berthing operations 130 times per year, time & load weighted engine operation  
Tug Supply boat making 52 round trips to FSRU per year, time & load weighted engine operation  
Crew boat making 182 round trips to FSRU per year, time & load weighted engine operation  
LNG carrier to FSRU berthing operations, 14 miles slow, 3 miles to FSRU with assist tugs, time & load weighted engine operation  
Operating component in federal waters only (outside 3-mile limit)  
LNG Carrier & Tug Supply dual fuel is 99% gasified LNG / 1% CA diesel by weight (99.2% / 0.8% by heat input)  
Crew boat is 100% gasified LNG

**Table FW 2: Tug/Supply Vessel Main Engine Emissions Summary**

SIC	1321	Tug Supply Main Generator Set Engines, 15,000 BHP, 2 vessels alternating port calls									
PROCESS EQPT DESCRIPTION	Scarborough LNG, 99.7% methane, 1 ppmv S & 15 ppmw S California diesel pilot charge										
FUEL TYPE/PROCESS INFO	21242	MW-hrs									
TOTAL YEARLY PROCESS RATE	1.23	MW									
HOURLY PROCESS RATE	PT071	MW-hrs									
PROCESS UNITS	1007.6	BTU/cu ft	Scarborough LNG								
HIGHER HEATING VALUE	15000	BHP	from BHP estimates								
COMBINED ENGINE RATING	11%	percent	from activity profile								
LOAD FACTOR	17264	hrs/yr	from activity profile								
OPERATING SCHEDULE	9751	BTU/KW-hr									
HEAT RATE	35.0%	percent									
CONVERSION EFFICIENCY	12.00	mmBTU/hr									
HEAT INPUT	8710	dscf/mmBTU	USEPA Method 19								
DRY Fd	0.37	mmdscf/hr									
EXHAUST FLOW											
EMITTENT NAME	EMITTENT PPMV	CORR FACTOR	CTL EF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	2 Vessels ACTUAL LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr			
Nitrogen Oxides (as NO <sub>2</sub> )	80	1.0000	2.8660	60,880	30.44	7.05	1.300	0.969			
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	92	1.0000	1.1464	24,352	12.18	2.82	0.520	0.388			
Carbon Monoxide (CO)	192	1.0000	4.1888	88,979	44.49	10.31	1.900	1.417			
Sulfur Dioxide (SO <sub>2</sub> )	0.03	1.0654	0.0017	36	0.02	0.00	0.0008	0.0006			
Particulates (as PM <sub>10</sub> ) (grains/dscf)	0.0033	1.0000	0.1433	3,044	1.52	0.35	0.065	0.048			
Carbon Dioxide (CO <sub>2</sub> )	3.00%	1.0000	1031.7688	21,916,892	10,958	2,539	468	349			

Wartsila Emission Factors for Series 32DF Engines

NO<sub>x</sub> = 1.3 g/kw-hr (Wartsila Specification 16 March 2006)

VOC = 0.52 g/kw-hr (Wartsila Report Specification 16 March 2006, corrected to 8% nonmethane per AP-42 Table 3.2-2)

CO = 1.9 g/kw-hr (Wartsila Specification 16 March 2006)

SO<sub>2</sub> = 1.65 E-4 lb/mmBTU (for 1 ppmv S)

PM<sub>10</sub> = 0.065 g/kw-hr (Wartsila quote 16 February 2006)

CO<sub>2</sub> = 468 g/kw-hr (Wartsila Report 4 July 2003)

Tug Supply dual fuel is 99% gasified LNG / 1% CA diesel by weight (99.2% / 0.8% by heat input)  
Power output 28,485,600 BHP-hr/yr

**Table FW 3: Tug/Supply Vessel Generator Engines Emissions Summary**

SIC	1321	Tug Supply Auxiliary Generator, 150 BHP, 2 vessels alternating port calls									
PROCESS EQPT DESCRIPTION		Scarborough LNG, 99.7% methane, 1 ppmv S									
FUEL TYPE/PROCESS INFO	966	MW-hrs									
TOTAL YEARLY PROCESS RATE	0.06	MW									
HOURLY PROCESS RATE	PT071	MW-hrs									
PROCESS UNITS	1007.6	BTU/cu ft									
HIGHER HEATING VALUE	150	Scarborough LNG									
COMBINED ENGINE RATING	50%	BHP									
LOAD FACTOR	17264	percent									
OPERATING SCHEDULE	9751	hrs/yr									
HEAT RATE	35.0%	BTU/KW-hr									
CONVERSION EFFICIENCY	0.55	percent									
HEAT INPUT	8710	mmBTU/hr									
DRY Fd	0.02	dscf/mmBTU									
EXHAUST FLOW		USEPA Method 19									
EMITTENT		2 Vessels									
NAME		EMITTENT PPMV	CORR FACTOR	CTL EF LBS/UNIT	ACTUAL LBS/YR	ACTUAL TONS/YR	ACTUAL LBS/HR	RATE* g/kw-hr	RATE g/bhp-hr		
Nitrogen Oxides (as NO <sub>2</sub> )		165	1.0000	5.9128	5,709	2.85	0.66	2.682	2.000		
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>		92	1.0000	1.1507	1,111	0.56	0.13	0.522	0.389		
Carbon Monoxide (CO)		248	1.0000	5.4315	5,244	2.62	0.61	2.464	1.837		
Sulfur Dioxide (SO <sub>2</sub> )		0.03	1.0000	0.0016	2	0.00	0.00	0.0007	0.0005		
Particulates (as PM <sub>10</sub> ) (grains/dscf)		0.0023	1.0000	0.0975	94	0.05	0.01	0.044	0.033		
Carbon Dioxide (CO <sub>2</sub> )		3.12%	1.0000	1072.6571	1,035,702	518	120	487	363		

Gas Emission Factors (AP-42 Table 3.2-2)

NO<sub>x</sub> = 2.682 g/kw-hr (CAT Series GLE Engines 2.0 g/bhp-hr)

VOC = 0.118 lb/mmBTU

CO = 0.557 lb/mmBTU

SO<sub>2</sub> = 1.65 E-4 lb/mmBTU (for 1 ppmv S)

PM<sub>10</sub> = 0.010 lb/mmBTU

CO<sub>2</sub> = 110 lb/mmBTU

Table FW 4: Tug/Supply Vessel Activity Summary

## Assist Tugs

Berthing Activity	Miles	Speed	Time, hrs	Mains	Weighted	Mode 1	Mode 2	Gens	Weighted	Mode 1	Mode 2
Standby/Patrol to LNG Carrier	3	18.5	0.16	51%	0.3%	2.7%	1.0%	50%	0.3%	0.7%	0.2%
Assist Carrier to FSRU	3	5	0.60	43%	1.1%	8.4%	3.0%	50%	1.2%	2.5%	0.9%
Assist Big Push			0.04	100%	0.2%	1.3%	0.5%	50%	0.1%	0.2%	0.1%
Safety Zone	0.3	1	0.30	22%	0.3%	2.1%	0.8%	50%	0.6%	1.2%	0.5%
Unload Standby/Patrol Safety Zone	0	min	21.80	10%	9.1%	70.9%	25.6%	50%	45.4%	90.8%	32.8%
Safety Zone	0.3	1	0.30	22%	0.3%	2.1%	0.8%	50%	0.6%	1.2%	0.5%
Safety Zone Big Push			0.04	100%	0.2%	1.3%	0.5%	50%	0.1%	0.2%	0.1%
Assist Carrier to Release	3	5	0.60	43%	1.1%	8.4%	3.0%	50%	1.2%	2.5%	0.9%
Release to Standby/Patrol	3	18.5	0.16	51%	0.3%	2.7%	1.0%	50%	0.3%	0.7%	0.2%
<b>Composite</b>			<b>24.00</b>		<b>13%</b>	<b>100.0%</b>	<b>38.1%</b>		<b>50.0%</b>	<b>100.0%</b>	<b>36.1%</b>
Two Vessels (per week)			120.0								

## Remarks - Berthing

2.5 berthings/wk = 130 berthings/yr  
 2.5 berthings/wk x 24 hrs x 2 vessels = 120 hrs/wk @ 13% power on mains  
 ship generators run all the time, so  
 2.5 berthings/wk x 24 hrs x 2 vessels = 120 hrs/wk @ 50% power on gens

Federal Waters Transit	Miles	Speed	Time, hrs	Mains	Weighted	Mode 1	Mode 2	Gens	Weighted	Mode 1	Mode 2
Loiter to Safety Zone	0.7	5	0.1	14%	0.5%	3.3%	0.1%	50%	1.7%	3.5%	0.1%
Safety Zone	0.3	1	0.3	12%	0.9%	6.1%	0.1%	50%	3.7%	7.5%	0.2%
Load/Unload Safety Zone	0	stop	2.3	0%	0.0%	0.0%	0.0%	50%	28.7%	57.3%	1.4%
Safety Zone	0.3	1	0.3	12%	0.9%	6.1%	0.1%	50%	3.7%	7.5%	0.2%
Cruise from Safety Zone to Boundary	18	18.5	1.0	51%	12.4%	84.4%	2.0%	50%	12.1%	24.2%	0.6%
<b>Composite Each Way</b>			<b>4.0</b>		<b>15%</b>	<b>100.0%</b>	<b>2.4%</b>		<b>50.0%</b>	<b>100.0%</b>	<b>2.4%</b>
Round Trip (per week)			8.0								

## Remarks - Federal Waters Transit

1 roundtrip/week = 52 roundtrips/year  
 1 trips/wk x 8 hr/trip = 8 hrs/wk @ 15% power on mains  
 ship generators run all the time, so  
 1 trips/wk x 8 hr/trip = 8 hrs/wk @ 50% power on gens

Time Balance (hrs/wk)	Miles	Speed	Time, hrs	Mains	Weighted	Mode 1	Mode 2	Gens	Weighted	Mode 1	Mode 2
Hours per week (2 vessels)			336								
District Waters & Port Time			4								
In Federal Waters			332								
Berthing Activity			120	13%	4.6%						
Transit			8	15%	0.4%						
Standby/Patrol Safety Zone (balance)			204	10%	6.1%	100.0%	61.4%	50%	50.0%	100.0%	61.4%
<b>Total Time in Federal Waters</b>			<b>332</b>		<b>11%</b>	<b>100.0%</b>	<b>61.4%</b>		<b>50%</b>	<b>100.0%</b>	<b>61.4%</b>
Per Year			17,264		11%				50%		

## Remarks - Federal Waters

52 wks/yr x 332 hrs/wk = 17,264 hrs/yr (2 vessels) @ 11% power on mains  
 ship generators run all the time, so  
 17,264 hrs/yr @ 50% power

	29,780,400	28,485,600	1,294,800
	<b>Modal Wt</b>	<b>Mains</b>	<b>Gens</b>
Assist/Standby/Loiter	8.3%	8.6%	2.4%
Safety Zone/Patrol	89.7%	89.4%	95.6%
Load/Unload	0.1%	0.0%	1.4%
Transit to/from Boundary/Limit	2.0%	2.0%	0.6%
	100.0%	100.0%	100.0%







**Table FW 7: Crew Boat Activity Summary**

**Crew Boats**

Support Activity	Miles	Speed	Time, hrs	Mains	Weighted	Mode	Gens	Weighted	Mode
Boundary to FSRU	18	18	1.00	90%	18.0%	39.2%	50%	10.0%	20.0%
Loiter FSRU	1.5	2	0.75	19%	2.9%	6.2%	50%	7.5%	15.0%
Safety Zone	0.3	1	0.30	16%	1.0%	2.1%	50%	3.0%	6.0%
Load/Unload Standby	0	stop	0.90	13%	2.3%	5.1%	50%	9.0%	18.0%
Safety Zone	0.3	1	0.30	16%	1.0%	2.1%	50%	3.0%	6.0%
Loiter FSRU	1.5	2	0.75	19%	2.9%	6.2%	50%	7.5%	15.0%
Cruise to Boundary	18	18	1.00	90%	18.0%	39.2%	50%	10.0%	20.0%
<b>Composite</b>			<b>5.00</b>		<b>46%</b>	<b>100.0%</b>		<b>50%</b>	<b>100.0%</b>
<b>Per Year</b>			<b>910</b>		<b>46%</b>			<b>50%</b>	

**Remarks - Federal Waters Transit**

1 roundtrip/berthing = 2.5 per week + 1 crew change/week = 3.5 roundtrips/week or 182 roundtrips/year

182 trips/yr x 5 hrs/trip = 910 hrs/yr @ 46% power on mains

ship generators run all the time, so

182 trips/yr x 5 hrs/trip = 910 hrs/yr @ 50% power

BHP-hr/yr	696,150	627,900	68,250
	<b>Modal Wt</b>	<b>Mains</b>	<b>Gens</b>
Assist/Standby/Loiter	14.1%	12.4%	30.0%
Safety Zone/Patrol	4.9%	4.2%	12.0%
Load/Unload	6.4%	5.1%	18.0%
Transit to/from Boundary/Limit	74.6%	78.3%	40.0%
	100.0%	100.0%	100.0%



**Table FW 9: LNG Carrier Vessel Activity Summary**

**LNG Carriers**

Berthing Activity	Miles	Speed	Time, hrs	BHP	Percent	Weighted	Mode
25 to 16 miles	9.0	12	0.75	28500	48%	1.5%	12.4%
16 to 13 miles	3.0	5	0.60	11400	19%	0.5%	4.0%
Safety Zone	0.3	1	0.30	5440	9%	0.1%	0.9%
Unload	0.0	stop	20.70	5440	9%	7.8%	65.4%
Safety Zone	0.3	1	0.30	5440	9%	0.1%	0.9%
13 to 16 miles	3.0	5	0.60	11400	19%	0.5%	4.0%
16 to 25 miles	9.0	12	0.75	28500	48%	1.5%	12.4%
<b>Composite</b>			<b>24.00</b>			<b>12%</b>	<b>100.0%</b>
<b>Per Year</b>			<b>3120</b>			<b>12%</b>	

**Remarks - Federal Waters Transit**

2.5 berthings/wk = 130 berthings/yr

130 berthings/yr x 24 hrs = 3120 hrs/yr @ 12% power

	<b>Modal Wt</b>	<b>Mode</b>
Assist/Standby/Loiter	7.9%	7.9%
Safety Zone/Patrol	1.9%	1.9%
Load/Unload	65.4%	65.4%
Transit to/from Boundary/Limit	24.8%	24.8%
	100.0%	100.0%

**ATTACHMENT 3**  
**REVISED APPENDIX C**

**The Appendix C denoted “Revised 4/6/06” should replace the Appendix A in the December 2005 Minor New Source Review Construction Permit Application in its entirety.**

## FSRU Emission Factors

Wartsila 9L50DF Main Generators (3)			Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )			0.075	g/bhp-hr	7.5	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 16 March 06	99.4% gasified LNG /
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>			0.149	g/bhp-hr	43	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 16 March 06	0.6% CA diesel (by
Carbon Monoxide (CO)			0.127	g/bhp-hr	21	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 16 March 06	heat input), 42.9%
Sulfur Dioxide (SO <sub>2</sub> )			0.0005	g/bhp-hr	0.03	ppmv @ 15% O <sub>2</sub>	Scarborough LNG / CA diesel specifications	efficiency
Particulates (as PM <sub>10</sub> )			0.04937	g/bhp-hr	0.0042	grains/dscf	BACT, Wartsila Specification, 16 March 06	
Carbon Dioxide (CO <sub>2</sub> )			331	g/bhp-hr	3.5%	percent volume	Wartsila Report 4 July 03	
Ammonia Slip (NH <sub>3</sub> )			0.037	g/bhp-hr	10	ppmv @ 15% O <sub>2</sub>	BACT, VCAPCD (permit engineering, 2003)	

Wartsila 9L50DF Backup Generator (1)			Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )			1.59	g/bhp-hr	150	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 13 May 05	CA diesel, 15 ppmw
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>			0.22	g/bhp-hr	60	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 13 May 05	S, 42.4% efficiency
Carbon Monoxide (CO)			0.16	g/bhp-hr	25	ppmv @ 15% O <sub>2</sub>	BACT, Wartsila Specification, 13 May 05	
Sulfur Dioxide (SO <sub>2</sub> )			0.0042	g/bhp-hr	0.29	ppmv @ 15% O <sub>2</sub>	CA diesel, 15 ppmw S	
Particulates (as PM <sub>10</sub> )			0.116	g/bhp-hr	0.0092	grains/dscf	BACT, Wartsila Specification, 13 May 05	
Carbon Dioxide (CO <sub>2</sub> )			388	g/bhp-hr	3.8%	percent volume	Wartsila specification 50DF, diesel	

Firewater Pump (3)			Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )			4.18	g/bhp-hr	326	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	CA diesel, 15 ppmw
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>			0.60	g/bhp-hr	134	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	S, 35% efficiency
Carbon Monoxide (CO)			2.61	g/bhp-hr	334	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	
Sulfur Dioxide (SO <sub>2</sub> )			0.0051	g/bhp-hr	0.29	ppmv @ 15% O <sub>2</sub>	CA diesel, 15 ppmw S	
Particulates (as PM <sub>10</sub> )			0.149	g/bhp-hr	0.0097	grains/dscf	USEPA Tier 2 Standards (>560 kw)	
Carbon Dioxide (CO <sub>2</sub> )			522	g/bhp-hr	4.3%	percent volume	USEPA AP-42, Table 3.3-1	

## FSRU Emission Factors

Emergency Generator (1)	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	4.18	g/bhp-hr	372	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	CA diesel, 15 ppmw S, 40% efficiency
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.60	g/bhp-hr	153	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	
Carbon Monoxide (CO)	2.61	g/bhp-hr	382	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>560 kw)	
Sulfur Dioxide (SO <sub>2</sub> )	0.0045	g/bhp-hr	0.29	ppmv @ 15% O <sub>2</sub>	CA diesel, 15 ppmw S	
Particulates (as PM <sub>10</sub> )	0.149	g/bhp-hr	0.0111	grains/dscf	USEPA Tier 2 Standards (>560 kw)	
Carbon Dioxide (CO <sub>2</sub> )	522	g/bhp-hr	4.9%	percent volume	USEPA AP-42, Table 3.3-1	

Freefall Lifeboats (3)	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	4.85	g/bhp-hr	324	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>37 kw, <75 kw)	CA diesel, 15 ppmw S, 30% efficiency
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.75	g/bhp-hr	143	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>37 kw, <75 kw)	
Carbon Monoxide (CO)	3.73	g/bhp-hr	410	ppmv @ 15% O <sub>2</sub>	USEPA Tier 2 Standards (>37 kw, <75 kw)	
Sulfur Dioxide (SO <sub>2</sub> )	0.0060	g/bhp-hr	0.29	ppmv @ 15% O <sub>2</sub>	CA diesel, 15 ppmw S	
Particulates (as PM <sub>10</sub> )	0.298	g/bhp-hr	0.0167	grains/dscf	USEPA Tier 2 Standards (>37 kw, <75 kw)	
Carbon Dioxide (CO <sub>2</sub> )	522	g/bhp-hr	3.6%	percent volume	USEPA AP-42, Table 3.3-1	

Selas Sub-X Low Emission SCVs (8)	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	0.0243	lb/mmmbtu	20	ppmv @ 3% O <sub>2</sub>	Selas Specification, Sub-XLE, 120-180 t/hr	100% gasified LNG
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.0017	lb/mmmbtu	4.1	ppmv @ 3% O <sub>2</sub>	Costain Report 6407-0200-064-01-0001, Appx. 1	
Carbon Monoxide (CO)	0.0739	lb/mmmbtu	100	ppmv @ 3% O <sub>2</sub>	Selas Specification, Sub-XLE, 120-180 t/hr	
Sulfur Dioxide (SO <sub>2</sub> )	0.0002	lb/mmmbtu	0.10	ppmv @ 3% O <sub>2</sub>	Scarborough LNG specification, 1 ppmv S	
Particulates (as PM <sub>10</sub> )	0.0019	lb/mmmbtu	0.0013	grains/dscf	USEPA AP-42, Table 1.4-2, non-condensable	
Carbon Dioxide (CO <sub>2</sub> )	106.8	lb/mmmbtu	9.2%	percent volume	Selas Specification, Sub-XLE, 120-180 t/hr	



## Operating Vessels Emission Factors

LNG Carriers	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	2.50	g/bhp-hr	235	ppmv @ 15% O <sub>2</sub>	USEPA AP-42, Tables 3.2-2 & 3.4-1	99.2% gasified LNG /
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.34	g/bhp-hr	92	ppmv @ 15% O <sub>2</sub>	USEPA AP-42, Tables 3.2-2 & 3.4-1	0.8% CA diesel by
Carbon Monoxide (CO)	1.61	g/bhp-hr	249	ppmv @ 15% O <sub>2</sub>	USEPA AP-42, Tables 3.2-2 & 3.4-1	heat input, 40% efficiency
Sulfur Dioxide (SO <sub>2</sub> )	0.0005	g/bhp-hr	0.03	ppmv @ 15% O <sub>2</sub>	Scarborough LNG / CA diesel specifications	
Particulates (as PM <sub>10</sub> )	0.031	g/bhp-hr	0.0024	grains/dscf	USEPA AP-42, Tables 3.2-2 & 3.4-1	
Carbon Dioxide (CO <sub>2</sub> )	319	g/bhp-hr	3.1%	percent volume	USEPA AP-42, Tables 3.2-2 & 3.4-1	

Tug Supply Boats (2)	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	0.97	g/bhp-hr	80	ppmv @ 15% O <sub>2</sub>	Wartsila Specification, 16 March 06	99.2% gasified LNG /
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.39	g/bhp-hr	92	ppmv @ 15% O <sub>2</sub>	Wartsila Specification, 16 March 06	0.8% CA diesel by
Carbon Monoxide (CO)	1.42	g/bhp-hr	192	ppmv @ 15% O <sub>2</sub>	Wartsila Specification, 16 March 06	heat input, generators
Sulfur Dioxide (SO <sub>2</sub> )	0.0006	g/bhp-hr	0.03	ppmv @ 15% O <sub>2</sub>	Scarborough LNG / CA diesel specifications	100% gasified LNG,
Particulates (as PM <sub>10</sub> )	0.048	g/bhp-hr	0.0033	grains/dscf	Wartsila Quote, 16 February 06	35% efficiency
Carbon Dioxide (CO <sub>2</sub> )	349	g/bhp-hr	3.0%	percent volume	Wartsila Report 4 July 03	

Crew Boat (1)	Factor	Units	Conc.	Units	Emission Factor Reference	Fuel
Nitrogen Oxides (as NO <sub>2</sub> )	2.00	g/bhp-hr	165	ppmv @ 15% O <sub>2</sub>	CAT Series GLE Engines	100% gasified LNG,
Reactive Hydrocarbons (ROC) as CH <sub>4</sub>	0.39	g/bhp-hr	92	ppmv @ 15% O <sub>2</sub>	USEPA AP-42, Table 3.2-2	35% efficiency
Carbon Monoxide (CO)	1.84	g/bhp-hr	248	ppmv @ 15% O <sub>2</sub>	USEPA AP-42, Table 3.2-2	
Sulfur Dioxide (SO <sub>2</sub> )	0.0005	g/bhp-hr	0.03	ppmv @ 15% O <sub>2</sub>	Scarborough LNG specification, 1 ppmv S	
Particulates (as PM <sub>10</sub> )	0.033	g/bhp-hr	0.0023	grains/dscf	USEPA AP-42, Table 3.2-2	
Carbon Dioxide (CO <sub>2</sub> )	363	g/bhp-hr	3.1%	percent volume	USEPA AP-42, Table 3.2-2	

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## 1. WÄRTSILÄ 50DF LNG FSRU POWER PLANT EXHAUST GAS EMISSIONS

The report describes the values that are achievable with the 50DF engines for the Cabrillo port LNG terminal project. Guarantees of these values are included in a technical specification and offer. In the chapter 1.2 the emission levels out of the engine are described and in chapter 1.3 the emissions out of a power plant fitted with emission reduction methods and analysed. It should be notable that the one emission level given in this document can be further improved but might have negative impact on other emissions levels. Therefore; if some special emission requirements occur they can be treated case by case.

All measurements and emission limits are done according to chapter 1.4.

### 1.1 FUEL DATA

The exhaust gas emissions are given according to a fuel gas specification below:

#### 1.1.1 Gas specification (at 0 °C , 100 kPa)

	vol %
CH <sub>4</sub>	99,66804
C <sub>2</sub> H <sub>6</sub>	0,111987
C <sub>3</sub> H <sub>8</sub>	0
n-C <sub>4</sub> H <sub>10</sub>	0
i-C <sub>4</sub> H <sub>10</sub>	0,009999
n-C <sub>5</sub> H <sub>12</sub>	0
i-C <sub>5</sub> H <sub>12</sub>	0
n-C <sub>6</sub> H <sub>14</sub>	0
n-C <sub>7</sub> H <sub>16</sub>	0
N <sub>2</sub>	0,189977203
O <sub>2</sub>	0,0099988
CO <sub>2</sub>	0,0099988
H <sub>2</sub> S	0
H <sub>2</sub>	0
H <sub>2</sub> O	0
CO	0
Ar	0
He	0

### 1.2 50DF ENGINE EMISSIONS

Table 1. Emission levels from 50DF engine without emission reduction <sup>(1)</sup>

<b>FUEL : Natural gas</b> <sup>(2)</sup>					
Unit	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>	PM <sub>10,dry</sub>
g/kWh	1.5	1.06	0.431	0.0759	0.0662
Vol-ppm, dry at 15% O <sub>2</sub>	135	128	87	4	
mg/m <sup>3</sup>					10

<b><u>FUEL : Marine diesel oil</u></b>					
g/kWh	14,7	1.03	0.651	0.0835	0.154
Vol-ppm, dry at 15% O <sub>2</sub>	970	111	123	4	
mg/m <sup>3</sup>					21

<sup>(1)</sup> Values given at 90% load

<sup>(2)</sup> only valid with the fuel gas defined

### 1.3 50DF POWER PLANT (WITH SCR AND OXIDATION CATALYST) EMISSIONS

This chapter describes the emission limits that are achievable with appropriate emission reduction methods on a 50DF power plant. The emission reduction can be optimised for gas fired operation or Marine diesel operation. This project focus on utilising natural gas as fuel and therefore the values are optimised according to gaseous fuel operation.

The emission levels on diesel can also be reduced; however these are not of highest priority and therefore not optimised in this evaluation.

**Table 2. Emission levels from 50DF power plant with SCR and oxidation catalysts emission reduction**  
<sup>(1)</sup>

<b><u>FUEL : Natural gas</u></b> <sup>(2)</sup>					
Unit	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>	PM <sub>10, dry</sub>
g/kWh	0.10	0.17	0.20	0.0759	0.0662
Vol-ppm, dry at 15% O <sub>2</sub>	9	20	40	4	
mg/m <sup>3</sup>					10
<b><u>FUEL : Marine diesel oil</u></b>					
g/kWh	14,7	1.03	0.651	0.0835	0.154
Vol-ppm, dry at 15% O <sub>2</sub>	970	111	123	4	
mg/m <sup>3</sup>					21

<sup>(1)</sup> Values given at 90% load

<sup>(2)</sup> only valid with the fuel gas defined

This chapter describes emission levels that are achievable with a DF power plant fitted with selective catalytic reduction. The values are only valid for Wärtsilä supplied equipment. The technical particulars are only described in the technical specification.

## **1.4 MEASURING METHODS**

Emission values are based on and valid only on following or principally similar measurement methods and limits:

### **1.4.1 Nitrogen oxides ( NOx )**

USA EPA Method 7E: Determination of nitrogen oxides from stationary sources ( instrumental analyzer method ).

### **1.4.2 Sulphur oxides ( SOx )**

After engine ( no deSOx equipment installed )

ISO/CD 8178-1 : Sulphur oxides are calculated from sulphur content in the fuel.

### **1.4.3 Carbon monoxide ( CO )**

USA EPA Method 10 : Determination of carbon monoxide emissions from stationary sources.

### **1.4.4 Total Hydrocarbons ( THC )**

USA EPA Method 25A: Determination of total gaseous organic concentration using a flame ionisation analyzer ( FID ).

### **1.4.5 VOC ( NM/NEHC ) after engine ( no catalyst installed )**

USA EPA Method 25A: Determination of total gaseous organic concentration using a flame ionisation analyser. None Methane None Ethane Hydrocarbons are defined as total hydrocarbons ( THC ) excluding methane and ethane. The methane and ethane concentrations in the exhaust gas are calculated based on the fuel analysis. The ratio of methane and ethane to THC in the fuel gas remain constant in the exhaust gas.

### **1.4.6 VOC ( NM/NEHC ) after an oxidation catalyst**

USA EPA Method 18: Measurement of gaseous organic compound emissions by gas chromatography. VOC is defined as Non Methane Non Ethane Hydrocarbons. Measured components are C3H8, C4H10, C5H12, C6H14, C2H4, C3H6, C4H8, C5H10 and C6H12. Formaldehyde concentration is negligible after a catalyst. If required this can be verified with method CTM-037.

### **1.4.7 Particulates**

PM ( Particulate matter as dry dust ).

ISO 9096: Determination of particulate emissions from stationary sources ( in stack method)

USA EPA Method 17: Determination of particulate emissions from stationary sources (in-stack method).

### **1.4.8 Filterable PM10**

USA EPA Method 17: Determination of particulate emissions from stationary sources (in-stack method)

USA EPA Method 201A (front half): Determination of filterable PM10 emissions (in-stack filter method with sizing device)

**1.4.9 PM ( Particulate matter as dry dust ) when flue gas temperature is < 160C  
eg after heat recovery boiler**

ISO 9096: Determination of particulate emissions from stationary sources.

USA EPA Method 5B: Determination of particulate emissions from stationary sources.

**1.4.10 Measurement uncertainties**

Measurement uncertainties to be evaluated by the party that carries out the measurement.

The assessment of the guarantee fulfilment to be performed according to Section 6.2 of the VDI 2048 guidelines.